

**O'NEILL / HASSEN**

Attorneys at Law

**MEMORANDUM ENDORSED**

November 12, 2020

VIA ECF and Email

Honorable Gregory H. Woods  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 11/12/2020
---

RE: *United States v. Lorry Gonzalez*, 20 Cr 425 (GHW)

Dear Judge Woods:

I represent Lorry Gonzalez in the above-captioned-matter. I write to respectfully request that Ms. Gonzalez's bail be modified to remove the condition of home confinement and place Ms. Gonzalez on a curfew. As the Court is aware, Ms. Gonzalez's eleven-year-old son is severely autistic; he has an IEP and requires special schooling and activities. Ms. Gonzalez is a single mother and is also caretaker to her twenty-year-old brother who is also autistic and lives in a special school for disabled children. The government consents to this request.

Ms. Gonzalez has been fully compliant with the terms of her release thus far and has made several significant positive changes to her life. She has moved out of her apartment which was the location of the alleged charges against her and has moved into a new home in New Jersey. She lives there with her son and is considering relocating her brother's schooling to a facility in New Jersey so she can monitor his care.

Ms. Gonzalez's son is in virtual school and requires frequent physical outdoor play and activities. The home confinement has made it difficult for him to get the physical activity he needs since he is not attending school in person, and Ms. Gonzalez is concerned that his health and sleep are affected. He is on a host of medications including medicine for sleep and she is hopeful that with this modification she will be able to provide him with sufficient exercise and outdoor play so that she will not need to increase the dosages of his medicine.

I thank the Court for its attention to this matter. Ms. Gonzalez is committed to positive change and we are hopeful with this modification she will be able to better parent her son and continue on a productive and law-abiding path.

Application granted. The condition of Ms. Gonzalez's pre-trial release requiring home detention is removed and is replaced with the following: The defendant is subject to a curfew from 8 p.m. to 7 a.m. The curfew hours may be modified by the pre-trial services office. The remaining conditions of Ms. Gonzalez's pre-trial release remain in full force and effect. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 13.

SO ORDERED.

November 12, 2020  
New York, New York

  
\_\_\_\_\_  
GREGORY H. WOODS  
United States District Judge

Kind regards,

/s/

Grainne E. O'Neill